

CALIFORNIA PRIVACY POLICY

Last Updated March 1, 2022

Thank you for choosing to be part of our community at Newton Education Solutions. Newton Education Solutions is committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at newtoneducationsolutions@gmail.com.

When you visit mathrunningrecords.com (the "**WEBSITE** (**www.mathrunningrecords.com**)"), and more generally, use any of our services (Newton Education Solutions which include the WEBSITE (www.mathrunningrecords.com)), we appreciate that you are trusting us with your personal information. Newton Education Solutions takes your privacy very seriously. In this privacy notice, Newton Education Solutions seeks to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. Newton Education Solutions hopes you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through Newton Education Solutions (which, as described above, includes our WEBSITE (www.mathrunningrecords.com)), as well as any related services, sales, marketing or events.

This [privacy policy](#) was created using Termly.

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1. WHAT INFORMATION DOES Newton Education Solutions COLLECT?

Personal information you disclose to us

In Short: Newton Education Solutions *collects information that you provide to us.*

Newton Education Solutions collects personal information that you voluntarily provide to us when you register on the WEBSITE (www.mathrunningrecords.com), express an interest in obtaining information about us or our products and Services, when you participate in activities on the WEBSITE (www.mathrunningrecords.com) (such as by posting messages in our online forums or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that Newton Education Solutions collect depends on the context of your interactions with us and the WEBSITE (www.mathrunningrecords.com), the choices you make and the products and features you use. The personal information Newton Education Solutions collects may include the following:

Personal Information Provided by You. Newton Education Solutions collect names; phone numbers; email addresses; mailing addresses; job titles; usernames; passwords; contact preferences; contact or authentication data; billing addresses; debit/credit card numbers; and other similar information.

Social Media Login Data. Newton Education Solutions may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the information described in the section called "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information as it relates to registering on our site.

Information automatically collected

In Short: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our WEBSITE (www.mathrunningrecords.com).*

Newton Education Solutions automatically collects certain information when you visit, use or navigate the WEBSITE (www.mathrunningrecords.com). This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our WEBSITE (www.mathrunningrecords.com) and other technical information. This information is primarily needed to maintain the security and operation of our WEBSITE (www.mathrunningrecords.com), and for our internal analytics and reporting purposes.

Like many businesses, Newton Education Solutions also collect information through cookies and similar technologies.

The information Newton Education Solutions

Log and Usage Data. Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our WEBSITE (www.mathrunningrecords.com) and which Newton Education Solutions records in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the WEBSITE (www.mathrunningrecords.com) (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

- *Device Data.* Newton Education Solutions collects device data such as information about your computer, phone, tablet or other device you use to access the WEBSITE (www.mathrunningrecords.com). Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system configuration information.
- *Location Data.* Newton Education Solutions collects information data such as information about your device's location, which can be either precise or

imprecise. How much information we collect depends on the type of settings of the device you use to access the WEBSITE (www.mathrunningrecords.com). For example, Newton Education Solutions may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from other sources

In Short: Newton Education Solutions *may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers and services to you and update our records, Newton Education Solutions may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

2. HOW DOES Newton Education Solutions USE YOUR INFORMATION?

In Short: Newton Education Solutions *processes your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

Newton Education Solutions use personal information collected via our WEBSITE (www.mathrunningrecords.com) for a variety of business purposes described below. Newton Education Solutions processes your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. Newton Education Solutions indicates the specific processing grounds we rely on next to each purpose listed below.

Newton Education Solutions uses the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook

account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.

- **To post testimonials.** Newton Education Solutions post testimonials on our WEBSITE (www.mathrunningrecords.com) that may contain personal information. Prior to posting a testimonial, Newton Education Solutions will obtain your consent to use your name and the consent of the testimonial. If you wish to update, or delete your testimonial, please contact us at company@email.com and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** Newton Education Solutions may use your information to request feedback and to contact you about your use of our WEBSITE (www.mathrunningrecords.com).
- **To enable user-to-user communications.** Newton Education Solutions may use your information in order to enable user-to-user communications with each user's consent.
- **To manage user accounts.** Newton Education Solutions may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** Newton Education Solutions may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** Newton Education Solutions may use your information as part of our efforts to keep our WEBSITE (www.mathrunningrecords.com) safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**

- **To respond to legal requests and prevent harm.** If Newton Education Solutions receives a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **Fulfill and manage your orders.** Newton Education Solutions may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the WEBSITE (www.mathrunningrecords.com).
- **Administer prize draws and competitions.** Newton Education Solutions may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** Newton Education Solutions may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** Newton Education Solutions may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** Newton Education Solutions and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our WEBSITE (www.mathrunningrecords.com), subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "[WHAT ARE YOUR PRIVACY RIGHTS](#)" below).
- **Deliver targeted advertising to you.** Newton Education Solutions may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: Newton Education Solutions *only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

Newton Education Solutions may process or share your data that we hold based on the following legal basis:

- **Consent:** Newton Education Solutions may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** Newton Education Solutions may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where Newton Education Solutions have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** Newton Education Solutions may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** Newton Education Solutions may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, Newton Education Solutions may need to process your data or share your personal information in the following situations:

- **Business Transfers.** Newton Education Solutions may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Vendors, Consultants and Other Third-Party Service Providers.** Newton Education Solutions may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the WEBSITE (www.mathrunningrecords.com), which will enable them to collect data on our behalf about how you interact with our WEBSITE (www.mathrunningrecords.com) over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Third-Party Advertisers.** Newton Education Solutions may use third-party advertising companies to serve ads when you visit or use the WEBSITE (www.mathrunningrecords.com). These companies may use information about your visits to our WEBSITE (www.mathrunningrecords.com)(s) and other WEBSITE (www.mathrunningrecords.com)s that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- **Affiliates.** Newton Education Solutions may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** Newton Education Solutions may share your information with our business partners to offer you certain products, services or promotions.
- **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the WEBSITE (www.mathrunningrecords.com)) or otherwise interact with public areas of the WEBSITE (www.mathrunningrecords.com), such personal information may be viewed by all users and may be publicly made available outside the WEBSITE (www.mathrunningrecords.com) in perpetuity. If you interact with other users of our WEBSITE (www.mathrunningrecords.com) and register for our WEBSITE (www.mathrunningrecords.com) through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our WEBSITE (www.mathrunningrecords.com), and view your profile.

4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: Newton Education Solutions *only shares information with the following third parties.*

Newton Education Solutions only share and disclose your information with the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

- **Advertising, Direct Marketing, and Lead Generation**
- **Affiliate Marketing Programs**

5. DOES NEWTON EDUCATION SOLUTIONS USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: Newton Education Solutions *may use cookies and other tracking technologies to collect and store your information.*

Newton Education Solutions may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

6. DOES Newton Education Solutions USE GOOGLE MAPS?

In Short: Yes, Newton Education Solutions *uses Google Maps for the purpose of providing better service.*

This WEBSITE (www.mathrunningrecords.com) (www.runningrecords.com) uses Google Maps APIs which is subject to Google's Terms of Service. To find out more about Google's Privacy Policy, please refer to this [link](#).

7. HOW DOES NEWTON EDUCATION SOLUTIONS HANDLE YOUR SOCIAL LOGINS?

In Short: *If you choose to register or log in to our services using a social media account, we may have access to certain information about you.*

Our WEBSITE (www.mathrunningrecords.com) offers you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.

Newton Education Solutions will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant WEBSITE (www.mathrunningrecords.com). Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand

how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

8. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITE (WWW.MATHRUNNINGRECORDS.COM)S?

In Short: Newton Education Solutions *is not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our WEBSITE (www.mathrunningrecords.com).*

The WEBSITE (www.mathrunningrecords.com) may contain advertisements from third parties that are not affiliated with us and which may link to other WEBSITE (www.mathrunningrecords.com)s, online services or mobile applications. Newton Education Solutions cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. Newton Education Solutions is not responsible for the content or privacy and security practices and policies of any third parties, including other WEBSITE (www.mathrunningrecords.com)s, services or applications that may be linked to or from the WEBSITE (www.mathrunningrecords.com). You should review the policies of such third parties and contact them directly to respond to your questions.

9. HOW LONG DOES Newton Education Solutions KEEP YOUR INFORMATION?

In Short: Newton Education Solutions *keeps your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

Newton Education Solutions will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When Newton Education Solutions has no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. HOW DOES Newton Education Solutions KEEP YOUR INFORMATION SAFE?

***In Short:** Newton Education Solutions aims to protect your personal information through a system of organizational and technical security measures.*

Newton Education Solutions has implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our WEBSITE (www.mathrunningrecords.com) is at your own risk. You should only access the WEBSITE (www.mathrunningrecords.com) within a secure environment.

11. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** You may review, change, or terminate your account at any time.*

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at company@email.com.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and

to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our WEBSITE (www.mathrunningrecords.com). To opt-out of interest-based advertising by advertisers on our WEBSITE (www.mathrunningrecords.com) visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account settings and update your preferences.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

13. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the WEBSITE (www.mathrunningrecords.com), you have the right to request removal of unwanted data that you publicly post on the WEBSITE (www.mathrunningrecords.com). To request removal of such data, please contact us

using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the WEBSITE (www.mathrunningrecords.com), but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information
C. Protected classification characteristics under California or federal law	Gender and date of birth
D. Commercial information	Transaction information, purchase history, financial details and payment information
E. Biometric information	No
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other WEBSITE (www.mathrunningrecords.com)s, applications, systems and

	advertisements
G. Geolocation data	Device location
H. Audio, electronic, visual, thermal, olfactory, or similar information	No
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us
J. Education Information	No
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics

Newton Education Solutions may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries

How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You can opt out from the selling of your personal information by disabling cookies in the Cookies Preferences Settings or clicking on the Do Not Sell My Personal Information link on our homepage.

You may contact us by email at newtoneducationsolutions@gmail.com, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

Newton Education Solutions may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

The current list of our service providers can be found below.

Newton Education Solutions may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data. [Newton Education Solutions] has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category B. Personal information, as defined in the California Customer Records law, such as your name, contact information, education, employment, employment history and financial information.

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under "[WHO WILL YOUR INFORMATION BE SHARED WITH?](#)".

Your rights with respect to your personal data

Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

Newton Education Solutions will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

Newton Education Solutions will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at company@email.com, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

Financial Incentives

"Financial incentive" means a program, benefit, or other offering, including payments to consumers as compensation, for the disclosure, deletion, or sale of personal information.

The law permits financial incentives or a price or service difference if

- a business has calculated a good-faith estimate of the value of the consumer's data that forms the basis for offering the financial incentive or price or service difference, and
- if a description of the method the business used to calculate the value of the consumer's data.

Newton Education Solutions may decide to offer a financial incentive (e.g. price or service difference) in exchange for the retention of sale or consumer's personal information.

If Newton Education Solutions decides to offer a financial incentive, we will notify you of such financial incentive and explain the price difference, as well as material terms of the financial incentive or price of service difference, including categories of personal information that are implicated by the financial incentive or price or service difference.

If Newton Education Solutions chooses to participate in the financial incentive you can withdraw from the financial incentive at any time by emailing us at newtoneducationsolutions@gmail.com, or by referring to the contact details at the bottom of this document.

14. DOES Newton Education Solutions MAKE UPDATES TO THIS NOTICE?

***In Short:** Yes, Newton Education Solutions will update this notice as necessary to stay compliant with relevant laws.*

Newton Education Solutions may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at company@email.com or by post to:

Newton Education Solutions - newtoneducationsolutions@gmail.com

HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA Newton Education Solutions **COLLECTS FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information Newton Education Solutions collects from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please email us. Newton Education Solutions will respond to your request within 30 days.